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18 Attorneys for Defendants
19 FIDELITY NATIONAL TITLE GROUP, INC. and
20 COMMONWEALTH LAND TITLE INSURANCE COMPANY

21 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
22 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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26 **UNITED STATES DISTRICT COURT**

27 **DISTRICT OF NEVADA**

28 HSBC BANK USA, N.A.,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC. et al.,

Defendants.

Case No.: 2:20-CV-02280-RFB-BNW

**STIPULATION AND ORDER TO
EXTEND TIME TO REPLY IN
SUPPORT OF MOTIONS TO DISMISS
AND OPPOSE COUNTERMOTION
FOR PARTIAL SUMMARY
JUDGMENT (ECF Nos. 35, 36, 47)**

SECOND REQUEST

COMES NOW defendants Fidelity National Title Group, Inc. ("FNTG") and
Commonwealth Land Title Insurance Company ("Commonwealth") (collectively, "Defendants")
and plaintiff HSBC Bank USA, National Association ("HSBC"), by and through their respective
attorneys of record, which hereby agree and stipulate as follows:

1 1. On December 16, 2020, HSBC filed its complaint in the Eighth Judicial District
2 Court for the State of Nevada;

3 2. On December 16, 2020, Commonwealth removed the instant case to the United
4 States District Court for the State of Nevada (ECF No. 1);

5 3. On March 30, 2021, FNTG and Commonwealth moved to dismiss HSBC's
6 complaint (ECF Nos. 35, 36);

7 4. On May 13, 2021, HSBC filed its opposition to FNTG's motion to dismiss (ECF
8 No. 45) and Commonwealth's motion to dismiss (ECF No. 46). HSBC also filed a countermotion
9 for partial summary judgment in response to Commonwealth's motion to dismiss (ECF No. 47);

10 5. On May 18, 2021, the Court granted the Parties' first stipulation to extend the
11 deadline for Defendants to reply in support of their motions to dismiss through June 3, 2021.
12 (ECF No. 51);

13 6. Counsel for Defendants are requesting a two-week extension of their deadline to
14 file their respective replies supporting their motions to dismiss and for Commonwealth to oppose
15 the motion for partial summary judgment, through and including June 17, 2021 to afford
16 Defendants' counsel additional time to review and respond to HSBC's various oppositions and the
17 countermotion.

18 7. Counsel for HSBC does not oppose the requested extension;

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1 8. This is the second request for an extension made by counsel for Defendants, which
2 is made in good faith and not for the purposes of delay.

3 **IT IS SO STIPULATED** that Defendants deadline to file their respective replies to their
4 motions to dismiss and for Chicago Title to oppose the motion for partial summary judgment are
5 hereby extended through and including June 17, 2021.

6 Dated: May 26, 2021

SINCLAIR BRAUN LLP

8 By: /s/-Kevin S. Sinclair

9 KEVIN S. SINCLAIR
10 Attorneys for Defendants
11 FIDELITY NATIONAL TITLE GROUP,
INC., and COMMONWEALTH LAND
TITLE INSURANCE COMPOANY

12 Dated: May 26, 2021

WRIGHT, FINLAY & ZAK, LLP

14 By: /s/-Christina V. Miller

15 CHRISTINA V. MILLER
16 Attorneys for Plaintiff
HSBC BANK USA, NATIONAL
ASSOCIATION

17 **IT IS SO ORDERED.**

18 Dated this 3rd day of June, 2021.

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20 RICHARD F. BOULWARE
21 UNITED STATES DISTRICT JUDGE
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